VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.

Lynn M V Notarianni
Lynn M V Notarianni

Executed on _10 -17 - 03_ .

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.

Loretta A. Huff
Loretta A. Huff

Executed on _10-14-2003_ .

Letter from Thomas F. Dixon, MCI, to ACC,
Docket No. T-000000A-97-0238, August 26, 2003

MCI WORLDCOM

Thomas F. Dixon
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August 26, 2003

William Mundell, Commissioner
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Re: Docket No. T-00000A-97-0238, Qwest's 271 Application

Dear Commissioner Mundell:

I have been advised by the Commission Staff that during the open meeting held August 21, 2003, you asked if anyone knew of any problems that had arisen with Qwest Corporation's ("Qwest") operation support systems ("OSS") in other states since its 271 applications were approved.

MCI's overall mass market (consumer) local exchange carrier ("LEC") reject rate for orders submitted was 15.4% for all Bell operating companies combined for the week ended August 15, 2003. The Qwest reject rate dropped below 30% for the first time that week to 28.4%. The overall small business market LEC reject rate was at 41.3%. The Qwest reject rate for small business orders was 40.7%. Below is a summary of our most recent experiences with Qwest's OSS and OSS documentation that impacts rejection of our orders in Qwest's OSS.

1. Intermediated Access ("IMA") is the method provided by Qwest for CLECs to access Qwest's OSS and process local orders. IMA solely impacts CLECs ordering practices and is not used by Qwest's retail side of its business. The current Change Management Process ("CMP") document lacks sufficient language to require that within specific timeframes Qwest correct software defects when the defect impacts CLECs' abilities to process local service requests ("LSRs"). Without such language, CLECs have no guarantees from Qwest that software defects will be fixed in a timely manner. A defect in the software means the system is not working in accordance with Qwest's published business rules. In turn, when a defect is identified, it is inappropriate for Qwest to simply update the document accordingly because it then places the burden on CLECs to adjust coding they implemented based on the prior documented business rules. In April 2003, MCI initiated a change request through CMP to provide such language that will be subject to a unanimous vote. It is anticipated that Qwest will reject the change request based upon attempts to negotiate a resolution through the CMPO process.

2. Qwest must synch up system edits with those being performed manually by their Interconnect Service Center ("ISC") personnel. Qwest implemented a system change request that would allow migration order types (UNE-P migrations) to be

processed by entering the telephone number and house number only. The intent of the "migrate by TN" change request was that less information would be required on the order than was required prior to the change that would result in less rejects for CLECs. After implementation, MCI saw a significant increase in migration order manual rejects and noted that the ISC personnel were editing more than what was required. A process change was implemented by Qwest after MCI provided examples of the out of synch condition between systems/manual processing of LSRs. A process must be established by Qwest to synch up system and manual edit processing. Qwest has agreed that the process is necessary, but there is no formal commitment to begin.

3.   When Qwest implemented what was expected to be Industry Standard "migrate as specified" ordering requirements, it neglected to provide "end-state" view requirements for features that drive blocking and hunting requests. In accordance with a Z-tel change request, Z-Tel requested "the ability to migrate customers as specified without having to list changes to the customer's current feature set." Qwest continues to require a distinction be made between what exists and what is changing for blocking and hunting features.

4.   When Qwest system edits are not documented or documented incorrectly, CLEC local orders are either rejected and/or incorrectly provisioned. MCI recently discovered a Qwest back-end system edit that is attempting to validate complete address information that is not required under Qwest published business rules. The edit requires address information be an exact match to what is listed in Qwest PREMIS database and can be retrieved via a preorder service address validation ("SAV") query. Not only are the address fields not supposed to be edited, but CLECs are not and should not be required to perform an SAV preorder query because it increases order processing timeframes. Moreover, an update to documentation would place the burden on CLECs to make system changes to accommodate what should have been documented correctly in the first place.

Another significant issue that can result when documentation is not adequately reflecting how the system is working is requested end user services are not provisioned. Qwest recently determined that blocking features are required to be provided in alphabetical order because that is how the system "expects" blocking features. If blocking features are not provided in alphabetical order, Qwest may only provision those that are provided for in alphabetical order, thus an out of synch condition may exist between what was requested and what Qwest provisioned. At this time the impact of this problem is unknown but Qwest was requested to provide analysis between LSR requests and Service Orders provisioned to determine the impact.

5.   Qwest cannot provide to CLECs the most current customer service record ("CSR") because it maintains retail CSRs as "live" until the end user's bill is rendered, paid and posted to Qwest billing system. When a CLEC migrates a local customer, Qwest houses two active customer service records. One with Qwest retail information and one that is generated for the CLEC when the customer migrates. The IMA system determines which CSR is valid per order by the use of a customer code identifier internally tracked by Qwest. If the CLEC is requested by the end-user to

change and/or correct what was provisioned, CLECs must distinguish which CSR is the customers and provide the valid customer code or the order will reject. MCI initiated a change request to eliminate multiple match conditions (SCR102202-01 - Customer Service Record) on October 22, 2002. While Qwest implemented changes to reduce multiple CSR scenarios, it did not address the intent of the original request which referenced the largest impact to CLECs. That is post migration when CLECs are most impacted by multiple CSR conditions 100% of the time until Qwest rendered, billed and posted the retail end user's final bill. Thus, MCI continues to see a large volume of rejects that are a result of multiple match CSR conditions.

A copy of this letter is being docketed and sent to all parties on the service list and being e-mailed to parties as well.

Sincerely yours,

Thomas F. Dixon

Letter from Elizabeth A. Woodcock, counsel for Qwest,
to ACC, September 4, 2003

Elizabeth A. Woodcock
PHONE: 303.291.2316
EMAIL: Ewoodcock@perkinscoie.com

Perkins Coie

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ACTION_____

September 4, 2003

William A. Mundell, Commissioner
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Re: Docket No. T-00000A-97-0238, Qwest's 271 Application

Dear Commissioner Mundell:

At the August 21, 2003 open meeting regarding Qwest's operational support systems ("OSS") test, questions about two different subjects were asked of the participants. The first question sought information about real world experience with issues relating to Qwest's OSS in other states that have approved Qwest's Section 271 application.[1] At the hearing, Andy Crain of Qwest responded by stating that any such concerns would have been raised in pending applications at the FCC, that Qwest is operating under the same rules and with the same dedication in states after it has received approval as it is in Arizona, and Qwest is the RBOC that has been required to pay the least amount in fines and penalties under performance plans. Thomas F. Dixon, of MCI WorldCom ("MCI"), has now submitted his August 26, 2003 letter in response to this question. Qwest responds to the issues Mr. Dixon raised below.

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[1] August 21, 2003 Transcript at 42-43. You initially asked about the real world experience in other states that have approved Qwest's Section 271 application. August 21, 2003 Transcript at 35. Chairman Spitzer then directed the question to the parties, reiterating the question as "whether anyone in the testing process is aware of any data from other jurisdictions." August 21, 2003 Transcript at 35-36. Staff consultant Hagood Bellinger, as well as Matt Rowell and Maureen Scott of the Staff, each responded that they were not aware of any problems. August 21, 2003 Transcript at 36.

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September 4, 2003
Page 2

The second question regarding issues related to the OSS test was directed only to Mr. Crain. Specifically, Mr. Crain was asked whether there were matters pending before commissions in any of the other 13 states in which Qwest has received approval of its Section 271 applications.[2] He responded that "[t]he only thing I am aware of that is pending that relates to these matters, and I'm just thinking through in my mind if there's anything else, is several CLECs have filed complaints relating to this DS1 issue that we just referred to."[3]

With regard to the five issues MCI raises, none of which is pending in front of state commissions, these issues represent five instances in which CLECs have raised issues through Qwest's Change Management Process ("CMP") and Qwest has appropriately responded to those issues in accordance with that process. Thus, as set forth below, these issues demonstrate that CMP is functioning as intended -- providing CLECs with a forum in which to raise issues and defined processes through which those issues are addressed.

1.   IMA software defects

MCI's first issue relates to how software defect issues relating to Qwest's Interconnect Mediated Access ("IMA") system are processed through Qwest's Change Management Process ("CMP").

CMP establishes processes through which CLECs can report, track, and escalate issues regarding Qwest's systems.[4] Qwest assesses the impact of the issue and assigns a severity level that triggers restoration or repair, as applicable, and gives priority to issues with the greatest impact. When Qwest discovers that its documentation is inconsistent with the manner in which its systems are currently behaving, Qwest may update its documentation as

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[2] August 21, 2003 Transcript at 43.

[3] August 21, 2003 Transcript at 44.

[4] *See* Qwest's Wholesale Change Management Process Document ("Wholesale CMP Document"), which can be found on Qwest's wholesale web site at http://www.qwest.com/wholesale/cmp/whatiscmp.html, at sections 12.4-12.7.

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Page 3

a work around so that the documentation accurately reflects what the system is doing. This step is necessary so that CLECs know what behavior to expect from the systems.

In addition, Qwest evaluates whether a system change is also necessary. A system change is not always required. Where the system is behaving properly, the only action required is that Qwest's documentation is modified to accurately reflect that behavior. However, there are instances when it is necessary to modify the system's behavior. In those instances, Qwest follows the relevant provisions of CMP to change the system. Then, if necessary, Qwest again modifies the documentation so that it reflects the system change to ensure that its documentation accurately reflects system behavior.

In April 2003, MCI submitted a CMP change request ("CR") for changes to the CMP language that seeks to impose fixed timeframes in which Qwest must resolve system issues based on the assigned severity level of the issue. Qwest has met with MCI and other CLECs on several occasions to discuss MCI's proposal. Because the time required to resolve a particular software issue can vary widely and is dependent upon the specific circumstances, Qwest cannot commit to resolve all issues in rigid, predetermined timeframes. Accordingly, Qwest proposed alternative language pursuant to which Qwest would commit to resolve software issues within the CLECs' specified timeframes where possible, but which allows Qwest the flexibility to identify and resolve more complicated system issues. Under Qwest's proposal, if it cannot resolve the issue within the specified timeframe, Qwest would instead be obligated to provide a date certain by which the problem would be resolved. Nonetheless, MCI and other CLECs were unwilling to provide any flexibility for Qwest to address complex software issues. Because Qwest cannot commit to prematurely deploy a software fix to meet a predetermined date in those instances where the issue simply cannot be resolved in that timeframe, Qwest was forced to vote against MCI's proposed CMP language change.

2.   System edits/ISC manual edits

This issue relates to the synchronization of Qwest's manual and mechanized LSR processing. MCI cites an example where Qwest's Interconnect Service Center ("ISC") personnel were editing LSRs more rigorously than Qwest's systems, resulting in more manual rejects for certain orders. It is Qwest's policy to keep the applicable manual processes synchronized with the mechanized processing of LSRs. Contrary to MCI's suggestion, this is an existing goal toward which Qwest constantly strives, not a process that has yet to be instituted. In those infrequent instances where the manual process is inconsistent with the applicable mechanized process, Qwest quickly responds to resolve the issue.

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Page 4

In the situation MCI cited as an example, MCI itself recognizes that Qwest worked with MCI to develop a process to resolve the problem. The Qwest Service Management Team worked with MCI through the CMP process to reach a resolution. Qwest then followed the appropriate CMP process to make changes to the PCAT (Ordering Overview). This situation demonstrates that the CMP process works effectively to resolve CLEC issues.

3.   "Migrate as specified" for blocking and hunting

This issue relates to ordering requirements for blocking and hunting features. The "migrate as specified" functionality implemented with EDI release 12.0 allows CLECs to request migration of an account by specifying the features the account should have, rather than listing the additions to or deletions from the features on the account at the time the account is migrated. Thus, the migrate as specified functionality allows the CLEC to designate only the "end-state" view it desires the account to have. MCI claims that Qwest continues to require CLECs to distinguish between "what exists and what is changing" for blocking and hunting features.

Contrary to MCI's claim, however, Qwest's systems currently allow CLECs to provide only the "end-state" view in most cases for both blocking and hunting. Further, with the implementation of EDI release 14.0 in December 2003, CLECs will be able to provide only the "end-state" information for all blocking requests.

Moreover, MCI previously raised the migrate as specified issue before the FCC in its proceeding regarding Qwest's 9 State application. The FCC has already determined that it does not constitute a checklist compliance issue: "Notwithstanding WorldCom's assertions to the contrary, we do not find it competitively significant that Qwest requires carriers to include a customer's existing services and other pieces of information in order to process an order."[5]

4.   System edits

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[5] Memorandum Opinion and Order, *Application of Qwest Communications International, Inc. for Authorization to Provide In-Region, InterLATA Services in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming*, WC Dkt. No. 02-314, FCC No. 02-332 (2002) ("*Qwest 9 State Order*"), at ¶58.

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Page 5

MCI raises two issues related to system edits. The first issue relates to the address validation edit that requires CLECs to provide the exact address that is provided in response to the Address Validation Query. This edit has been consistently communicated to CLECs in EDI team meetings and during the implementation process. For example, EDI FAQ Pre-order #1 states as follows:

> The exact address as provided by the Address Validation Query
> should always be the address used by the CLEC on an LSR, as this
> is the address on which the BPL performs it address validation edit.

Although this requirement has existed for several years,[6] Qwest's current disclosure document for EDI release 12.0 indicated that certain address fields were "optional," and therefore would not require an exact match with the Address Validation Query.

On August 19, 2003, MCI opened and simultaneously escalated a trouble ticket requesting that Qwest remove the address validation edit until its documentation has been updated and MCI has had time to update its system to reflect the requirement.

In accordance with the CMP process, Qwest investigated the issue and responded to MCI. In this situation, Qwest determined that its documentation erroneously indicated that the fields are "optional" instead of "conditional" -- thus requiring a documentation change, but no system change. On August 28, 2003, Qwest advised that it would update its IMA documentation in the next IMA-EDI Disclosure Document Addendum, scheduled for release on September 15, 2003, to reflect the long-standing requirement for an address that exactly matches that returned by the Address Validation Query. In addition, Qwest advised that the systems edits would be left in place. Qwest determined that no system changes were appropriate because, in addition to the fact that Qwest has consistently communicated and reinforced this edit with CLECs, these edits are important for the proper automated processing of orders. Further, the edits could not be removed before the documentation is updated.

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[6] MCI has been aware since before June 13, 2002, when it submitted a CR requesting to migrate UNE-P customers by telephone number and to eliminate the requirement to provide an address that exactly matches the information returned by the Address Validation Query. MCI is also aware of the conditional requirement through communications with the Qwest EDI technical team that supports MCI. Additionally, MCI originally certified on EDI release 10.0, which contained this requirement.

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Page 6

Finally, in its continuing effort to address CLEC concerns regarding issues such as this, Qwest is implementing a change request to eliminate the address validation requirement for post-migration LSRs that do not involve a change in customer's physical location. This change will be implemented in EDI release 14.0 in December 2003.

MCI's second issue relating to system edits involves the requirement that a CLEC requesting blocking features must provide entries for those features in alphabetical order because the system "expects" them in that order. This issue arose during the discussion of blocking issues at a meeting of the CMP Oversight Committee.[7]

Because Qwest's documentation is not consistent with the system requirement, Qwest has provided a draft of updated PCAT language through the appropriate CMP processes for CLECs to review and comment upon. In this situation, Qwest has determined that it can remove this requirement and will implement the system change to do so concurrently with EDI release 14.0 in December 2003. In the interim, Qwest has advised CLEC to provide the entries in alphabetical order as a work around until the system change is implemented.

Again, these examples demonstrate that the CLECs can raise issues through the CMP process and work with Qwest to resolve them.

5.   Multiple-match CSRs

Finally, MCI raises an issue that it initially raised nearly a year ago. The issue relates to limited instances when, for a brief period of time, two customer service records ("CSRs") may exist when the customer has switched to a new service provider. When the customer converts to a new service provider the previous account CSR remains active pending final billing. A new account CSR is also created reflecting the service from the new provider. During the brief time these two accounts are in this state, there are two CSRs and the CLEC must determine which is the appropriate CSR. In October 2002, MCI submitted a CR to

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[7] The CMP Oversight Committee is comprised of a Qwest representative, representatives from up to six CLECs, and representatives of state commissions that wish to participate. Wholesale CMP Document, section 18.4.2. The committee reviews, considers, and makes recommendations on issues presented to it by a CLEC or Qwest.

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eliminate the situations in which Qwest's systems create multiple CSRs and CLECs must determine which to use.

MCI's statement in its letter that "MCI continues to see a large volume of rejects that are a result of multiple match CSR conditions" is puzzling. First, as the FCC found in its *Qwest 9 State Order*, there are "only limited chances of this problem occurring."[8] Pointing to the approximately 4% occurrence rate and the fact that CLECs can work around this issue to identify the appropriate CSR using information already provided, the FCC concluded that CLECs "are nonetheless able to submit a complete and accurate conversion LSR."[9] Since then, Qwest has significantly reduced the already minimal occurrence of multiple-match CSRs through the implementation of system changes in July 2003. With these changes, the occurrence rate decreased from approximately 4% to well under 2%. Moreover, despite repeated requests for such information, MCI has failed to provide Qwest with information regarding any specific instances in which this issue has affected MCI.

Thus, again, through implementing change requests through CMP demonstrates that Qwest has appropriately addressed this CLEC issue through the existing CMP processes.

Thus, as discussed above, the issues MCI raised are all being appropriately addressed through the Change Management Process.

Very truly yours,

Elizabeth A. Woodcock

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[8] *Qwest 9 State Order*, ¶57.

[9] *Qwest 9 State Order*, ¶57.

Transcript from September 8, 2003,
ACC Open Meeting (Excerpt)

0212
1   BEFORE THE ARIZONA CORPORATION COMMISSION
2
3   IN THE MATTER OF QWEST   )
    COMMUNICATIONS INTERNATIONAL,   )   DOCKET NO.
4   INC.'S, QWEST SERVICES   )   T-01051B-02-0666
    CORPORATION'S, AND QWEST   )

5   CORPORATION'S NOTICE OF SALE,   )
    REQUEST FOR WAIVER, OR   )
6   APPLICATION FOR APPROVAL OF   )
    THE SALE OF THE ARIZONA   )
7   OPERATIONS OF QWEST DEX, INC.   )
)
8   IN THE MATTER OF U S WEST   )   DOCKET NO.
    COMMUNICATIONS, INC.'S   )   T-00000A-97-0238
9   COMPLIANCE WITH SECTION 271 OF   )
    THE TELECOMMUNICATIONS ACT OF   )
10 1996 - (RECOMMENDED ORDER AND   )
    STAFF REPORTS OF OSS AND   )
11 NON-OSS ISSUES ARISING FROM THE   )
    JULY 2002 SUPPLEMENTAL WORKSHOP   )
12 RELATING TO CHECKLIST ITEMS 1   )
    AND 2).   )
13   )
    IN THE MATTER OF U S WEST   )   DOCKET NO.
14 COMMUNICATIONS, INC.'S   )   T-00000A-97-0238
    COMPLIANCE WITH SECTION 271 OF   )
15 THE TELECOMMUNICATIONS ACT OF   )   SPECIAL OPEN MEETING
    1996 - (SECTION 272 UPDATE).   )
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0213
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6
7   REPORTER'S TRANSCRIPT OF PROCEEDINGS
8
9
10   VOLUME II
11   (Pages 212 through 277)
12
13
14   September 8, 2003
                        Phoenix, Arizona
15

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18              MS. CLAUSON:  The first issue from the
19   August 21, '03 meeting -- and again, these are the two
20   pages right before the Certificate of Service at the end
21   of the packet.  So they are the two pages right on top
22   of the certificate of service.
23              In the transcript, Chairman Spitzer, you had
24   asked about the status of OSS in other states, and MCI
25   filed a letter in response to that on August 26th, and
0220
 1   Eschelon has many of the same issues as MCI.  So we
 2   wanted to support that information.  In the Proposed
 3   Order at paragraphs 23 and 24, the Proposed Order states
 4   that these issues have been resolved from CMP, but as
 5   stated in MCI's letter, there are still issues to be
 6   resolved, and we wanted to note that.  They're the same
 7   issues, and I can go through them if you would like,
 8   what they are.  Otherwise, they're stated in the letter.
 9              CHMN. SPITZER:  Ms. Scott, do you have an
10   opinion?
11              MS. SCOTT:  Chairman Spitzer, Commissioners,
12   in reviewing the letter submitted by WorldCom, I think
13   it was Staff's impression of most of the issues listed
14   that they were being appropriately channeled through the
15   CMP process, and were being resolved in the context of
16   that process.  And when Staff reviewed the issues, it
17   thought that that was the appropriate place to address
18   them at this point in time.
19              CHMN. SPITZER:  Okay.  My feeling is, and I
20   don't want to be plutonian and talk about what is the
21   meaning of the word resolved, but it seems that is the
22   dispute here.  And my understanding of this whole
23   process is that it is an ongoing process designed to
24   incorporate change, and that's the purpose of the whole
25   thing.  And you will never reach resolution -- if
0221
 1   resolution is defined as immutable forever, I don't
 2   think that's correct.
 3              So I'll tell my colleagues I am inclined
 4   towards Ms. Scott's interpretation of the term resolved
 5   as opposed to Eschelon's.  At some point, you're arguing
 6   about how many angels on the head of the pin in terms of
 7   the Order.  And there will be issues that will crop up
 8   in the future, and I don't think we're intending to
 9   foreclose further work by all the parties to deal with
10   these issues.
11              I see Ms. Scott nodding her head.
12              MS. SCOTT:  I agree with that, Chairman.
13              COM. MUNDELL:  Let me just follow up.
14              CHMN. SPITZER:  Please.
15              COM. MUNDELL:  Thank you, Mr. Chairman.
16              Ms. Scott, so we had sort of, we had
17   discussion about issues that have come up in other
18   states, and I guess the question I have is there's
19   certainly, we want to continue working through the
20   process and trying to work out any problems that exist,
21   but from your perspective, there were no major problems
22   in other states that we should be aware of that would
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23 have an impact on the, for lack of a better word, the
24 big picture on competition in Arizona?
25   MS. SCOTT: In my opinion, Commissioner
0222
 1 Mundell, there are no issues that I have seen raised by
 2 the parties that are 271 affecting. And I guess that
 3 goes to what you just stated, that it does not rise to
 4 the level where Qwest's Application should be put on

 5 hold or denied because of those issues. Whether or not
 6 a party has raised an issue that may be CLEC affecting,
 7 I can't say one way or another. But what I can say is
 8 that the issues do appear to be in their proper forum at
 9 this point, which is the CMP process which all parties
10 have agreed to utilize to bring problems to Qwest's
11 attention and to resolve them. So that process does
12 seem to be working so far.
13   COM. MUNDELL: And I don't know if we should
14 hear from Eschelon or Staff with a follow up, and that
15 process seems to be working currently and you believe
16 going forward that issues will be resolved in a timely
17 fashion?
18   MS. SCOTT: I guess that question I would
19 probably defer to the parties, Commissioner Mundell. I
20 myself have not had direct involvement in the CMP
21 process, so I can't speak effectively to that. But from
22 what we've seen of the written process, it provides a
23 procedures for resolution of issues in a timely fashion.
24 Whether or not it is actually working that way, you
25 would want to address that with the other parties
0223
 1 perhaps.
 2   COM. MUNDELL: I appreciate that. I think
 3 in my question I said either Eschelon or Staff.
 4   CHMN. SPITZER: Ms. Clauson, you heard the
 5 dialogue among the Commissioners and Ms. Scott.
 6   MS. CLAUSON: Yes. Chairman Spitzer,
 7 Commissioner Mundell, with respect to whether this is an
 8 issue for 271, I am not arguing on this basis alone you
 9 should deny 271. If you do grant it, we're not
10 supporting the petition, but if you grant it, we are
11 just trying to make sure something is not foreclosed.
12 We will continue to have issues with respect to this in
13 CMP. One of the issues on list number 1 is already at
14 impasse, and they will go forward. And to the extent by
15 not addressing any other issues, rather than that being
16 foreclosed, we just wanted to let you know, A, the
17 status because you had asked, and B, that we do have
18 these issues, and you will probably see them in another
19 context.
20   CHMN. SPITZER: Ms. Clauson, doesn't the
21 change management process assume there are going to be
22 issues going forward post-271, given the nature of
23 technology and the nature of the business?
24   MS. CLAUSON: Yes. One of these issues, for
25 example, is one that we raised in the Arizona 271
0224

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 1   proceeding in September of 2000.  So it's, and it's
 2   still an issue today where we're closer than we were
 3   then.  So it does assume that, but you do hope at some
 4   point there will be an end to some of them.
 5                  CHMN. SPITZER:  Anything further,
 6   Commissioner Mundell?
 7                  COM. MUNDELL:  No.
 8                  CHMN. SPITZER:  Yes.
 9                  MR. POOLE:  Mr. Chairman, if I might, just
10   for the completeness of the record, Qwest did respond to
11   the letter, MCI letter from Mr. Dixon and made that
12   filing with the Commission on September 4th, and it
13   confirms exactly what the Chairman said, that change
14   management is an iterative process, is ongoing, and this
15   gives a status update on each of the five items that
16   were identified by MCI in its correspondence to the
17   Commission.
18                  CHMN. SPITZER:  And that would have been, is
19   that Mr. Berg's letter?   I'm trying to --
20                  MR. POOLE:  No, a letter signed by
21   Ms. Woodcock of Perkins Coie on behalf of Qwest.
22                  CHMN. SPITZER:  Okay.
23                  MR. POOLE:  And it was filed September 4.
24                  CHMN. SPITZER:  Okay.  Do you have further
25   comment?
0225
 1                  MS. CLAUSON:  There were two more issues.
 2                  CHMN. SPITZER:  Right.
 3                  MS. CLAUSON:  And again, these were raised,
 4   actually this one by you, so it's whether you continue
 5   to want the status, it's the loop conditioning special
 6   construction issue.
 7                  CHMN. SPITZER:  Right.  That's from the
 8   transcript of August 21?
 9                  MS. CLAUSON:  Correct.  And with respect to
10   that issue, the Staff Proposed Order does contain
11   paragraph 109 on this issue which we believe is the
12   proper resolution.  We support that.  Qwest has not
13   filed exception.  We are a little concerned between the
14   difference in the statements made to Qwest in that
15   transcript and what we believe has really transpired.
16   We believe that the way --
17                  CHMN. SPITZER:  That transcript, you mean
18   the August 21 transcript?
19                  MS. CLAUSON:  The August 21 transcript.  In
20   that transcript, Qwest, you, Chairman Spitzer, asked
21   about the status, and Qwest responded that they had
22   basically turned the clock back, withdrawn the CRs and
23   gone back to the way it was before June, and 12 CLECs
24   had joined together and made a proposal to withdraw
25   those changes and go back to June.  But in fact, there
0226
 1   are some differences now between now and June, and we do
 2   still have some concerns about that.  But as long as
 3   this is in the record and we have that Order, we believe
 4   that we'll be able to rely on that.  But --
 5                  CHMN. SPITZER:  Now, this is likely to be a
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PC041503-1CM (Add to Section 4.0 Types of Change CLEC
impacting defect) (CR Detail)

| | | Line #: | | 152 |

CR #	Title	Current Status Date	Organization	Area Impacted	Products Impacted
PC041503-1CM	Add to section 4.0 TYPES OF CHANGE CLEC impacting defect	Completed 8/29/03	Wholesale ProdProc	Pre Ordering, Ordering, Billing, Maintenance Rep	

Originator:

Originator Company Name: MCI

Director: Schultz, Judy

Owner: White, Matt

CR PM: Sanchez-Steinke, Linda

Description Of Change

Proposed language update to CMP document as follows:

Defect requests would be changes that correct problems discovered in production versions of an interface. These problems are where the interface is not working in accordance to the user requirements or the business rules published by Qwest. In addition, if functional requirements agreed upon by Qwest and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with Qwest and may include documentation that is in error, has missing information or is unclear in nature. Defined severity levels and time frames for corrective action would be as follows:

o Severity 1 – Critical – Problem results in a complete system outage and/or is detrimental to the majority of the development and/or testing efforts. Correction of Severity 1 defects will occur within 3 days.

o Severity 2 – Serious – System functionality is degraded with serious adverse impact to the users and there is not an effective work-around. Correction of Severity 2 defects will occur within 10 business days following the date upon which Qwest's defect validation process is scheduled to complete.

o Severity 3 – Moderate – System functionality is degraded with a moderate adverse impact to the users but there is an effective workaround. Correction of Severity 3 defects will occur within 30 business days following the date upon which Qwest's defect validation process is scheduled to complete.

o Severity 4 – Cosmetic – There is no immediate adverse impact to the users. Correction of Severity 4 defects will occur within 45 business days following the date upon which BellSouth's defect validation process is scheduled to complete. The

Note: There is supplemental information pertaining to this CR. A copy of the supplemental information immediately follows the report for this CR. timetime

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CLEC and/or Qwest may initiate these types of changes affecting interfaces between the CLEC's and Qwest's operational support systems.

Detailed steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the CLEC impacting defect type CR must be negotiated. This process will be used to validate defects, provide status notification(s), workarounds and final resolution to the CLEC community.

Expected Deliverable:
That the CMP document support language to address clec impacting defects (system and/or documentation) with corrective action timelines imposed.

Status History

04/15/03 - CR Received
04/17/03 - CR Acknowledged
05/21/03 - Presented at CMP Meeting
06/10/03 - Ad Hoc Meeting
07/08/03 - Held Ad Hoc Meeting
07/16/03 - CR Discussed at CMP Monthly Meeting
07/29/03 - Held Ad Hoc Meeting
08/01/03 - Qwest sent e-mail to John Berard, Phyllis Burt, Stephanie Prull, Jennifer Arnold, Bonnie Johnson
08/04/03 - Qwest sent notification CMPR.08.04.03.F.01540.RequestforResponse, written response to MCI proposed language
08/20/03 - CR discussed at August CMP Meeting
08/29/03 - Held Ad Hoc Meeting
09/04/03 - Qwest sent vote disposition, meeting minutes, and voting tally form, CMPR.09.04.03.F.01561.Vote_Disposition

Project Meetings

Ad Hoc Meeting Minutes
PC041503-1CM
Add to section 4.0 TYPES OF CHANGE CLEC impacting defect
CMP Product & Process
August 29, 2003
1-877-550-8686, Conference ID 2213337#
11:30 a.m. - 11:45 a.m. Mountain Time

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PURPOSE

At the August CMP Meeting, participants agreed to hold a conference call to conduct voting on the proposed changes to Section 4.0 of the CMP. The following is the write-up of the discussion.

List of Attendees:
Julie Pikar - U S Link
Jen Arnold - U S Link
Liz Balvin - MCI
Bonnie Johnson - Eschelon
Kim Issaacs - Eschelon
Byron Dowding - Alltel
Matt White - Qwest
Steve Kast - Qwest

MEETING MINUTES

The meeting began with Qwest making introductions and welcoming all attendees.

Matt White with Qwest explained that the purpose of the meeting was to vote on CMP CR PC041503-1CM. Matt explained that quorum is 6 and we have established quorum with 7 attendees. Matt asked if everyone was clear on what we were voting on and asked if anyone is uncomfortable voting out loud that they could e-mail their vote and he would arrange for cmpcr@qwest.com to be monitored to receive the vote.

The following votes were provided by meeting participants:
MCI voted yes
Eschelon voted yes
U S Link voted yes
Alltel voted yes

Matt read the e-mail votes:
Allegiance voted yes
McLeod voted yes
Qwest voted no

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